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The U.S. Navy's Role in Executing the Maritime CONOPS for U.S. Homeland Security/Defense

by

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A paper submitted to the Faculty of the Naval War College in partial satisfaction of the requirements of the JMO Department.

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ABSTRACT

The U.S. Navy's Role in Executing the Maritime CONOPS for U.S. Homeland Security/Defense

The terrorist events of September 11, 2001, have necessitated a complete rethinking of U.S. Homeland Security and Defense (HLS/D). The Navy's role in Maritime HLS/D is to support the Coast Guard; however, the Coast Guard does not have the resources available to combat this problem alone. The Navy provides capability to perform the specified, implied, and essential tasks required to meet Maritime HLS/D objectives. The Navy and Coast Guard require a simple, effective, integrated CONOPS to accomplish maritime HLS/D. This paper suggests such a CONOPS with particular attention to the tasks that the Navy should perform. The proposed U.S. HLS/D maritime CONOPS comprises Prevention, Defense, and Response phases and discusses how best the Navy may perform the relevant maritime tasks in each phase. Maritime tasks include: deterring enemy threats against the homeland; defending against enemy attacks; supporting civil authorities; security cooperation and contingency response with Canada and Mexico; and command and control coordination.

The U.S. Navy's Role in Executing the Maritime CONOPS for U.S. Homeland Security/Defense

INTRODUCTION

The terrorist events of September 11, 2001, have necessitated a complete rethinking of U.S. Homeland Security and Defense (HLS/D). So significant was the deficiency in protecting the United States that a new federal agency was created (the Office of Homeland Security) and plans put in effect to modify the U.S. military command structure. The forthcoming 2002 Unified Command Plan (UCP) dictates a new geographic command for North America; Commander, U.S. Northern Command (CINCUSNORTHCOM) will oversee homeland defense and civil support for the United States. The new CINCUSNORTHCOM will be tasked to provide homeland defense of the United States, including land, aerospace, and sea defenses. This paper addresses options for achieving maritime security/defense against terrorist attacks within America's maritime domain.

The research question is: "What should be the maritime Concept of Operations (CONOPS) for U.S. Homeland Security/Defense (HLS/D), and how best might the U.S. Navy accomplish the maritime tasks required by the CONOPS?" To answer this question, this paper first analyzes the myriad of proposed CONOPS for HLS/D. The paper then addresses the strategic objectives, and formulates a preliminary HLS/D CONOPS and Maritime HLS/D CONOPS. Finally, the paper discusses associated maritime tasks and evaluates how the Navy can provide assistance in this area.

The initial phase of this research was a literature review to examine existing materials concerning HLS/D CONOPS and, more importantly, Maritime HLS/D CONOPS. The analytical focus is the essential tasks required to achieve maritime mission success and recommendations on how the Navy/Marine Corps team aids in achieving the Maritime HLS/D objectives.

CONOPS FORMULATION

In order to formulate a Maritime HLS/D CONOPS, we first define its essential components. The principal purpose of a CONOPS is to clarify the commander's intent with respect to the deployment, employment, and support of own forces and assets, and to identify major objectives and target dates for their attainment. A CONOPS provides a verbal or graphic statement, in broad outline, of a commander's intentions in regard to an operation or series of operations. Such concepts are frequently embodied in campaign plans and operations plans, and provide overall pictures of the operations. iii

Joint and Navy doctrine provide sufficient foundation for an effective HLS/D Maritime CONOPS, specifically <u>Doctrine for Joint Planning</u> (Joint Publication 5-0), <u>Naval Planning</u> (Naval Doctrine Publication, NDP-5), and <u>Naval Operational Planning</u> (Navy Warfare Publication, NWP 5-01, Rev. A). As reflected in the latter document, a CONOPS is an elaborated version of the commander's selected (and approved) course of action (COA) derived from the Commander's Estimate of the Situation (CES) process. A CONOPS has the following essential components:

- Physical Objective (s)
- Commander's Intent
- Scheme of Maneuver
- Sector of Main Effort
- Sector of Support Effort
- Phasing
- Cover and Deception
- Employment of force elements (ground, naval, air, special forces, space, etc.)
- Fires (type, purpose, priorities)
- Allocation of sustainment assets
- NBC (offensive and/or defensive)
- Reserves (designation, purpose, location, and anticipated employment).

The commander also explains his/her supporting actions, command and control arrangement, the priority of fires, and how operational reserves are to be employed. This list is not all inclusive. The commander has the option of adding and deleting the above components as necessary.

HLS/D NATIONAL CONOPS

Before addressing the DOD portion of HLS/D we must first discuss the current literature.

The Office of Homeland Security is scheduled to present a national strategy on preparing the United States for terrorist attacks to President Bush in June.

If approved, the strategy would provide a road map for the multitude of federal, state, and local agencies involved in homeland defense.

A National HLS/D CONOPS has not been published; however, a vast amount of literature exists to suggest a framework for a preliminary HLS/D CONOPS. The Office of Homeland Security was established to develop and coordinate the implementation of a comprehensive national strategy to secure the United States from terrorist threats and attacks. The Office will coordinate the Executive Branch's efforts to detect, prepare for, prevent, protect against, respond to, and recover from terrorist attacks within the United States. vi In the detection phase, the Office will identify priorities and coordinate efforts for collection and analysis of information within the United States regarding threats of terrorism against the United States, and activities of terrorists or terrorist groups within the United States. During the preparedness phase, the Office will coordinate national efforts to prepare for and mitigate the consequences of terrorist threats or attacks within the United States. In the prevention phase, the Office intends to coordinate efforts to deter or preclude terrorist attacks within the United States. Finally, the Office will coordinate efforts to respond to and promote recovery from terrorist threats or attacks within the United States. vii The Office of Homeland Security must designate Federal, State, and local agency responsibilities to ensure the strategic objective of protecting the United States from terrorist attacks is achievable. In addition to using the four instruments of national power (diplomatic, military, economic, and informational), the nation must rely heavily on civil authority at the Federal, state, and local levels. Although many agencies provide valuable support in ensuring security in the United States, the Department of Defense (DOD) plays a vital role in achieving the desired end state.

THE DOD'S ROLE IN HLS/D

The events of September 11, 2001, dictate DOD participation across the entire spectrum of HLS/D. DOD must now expand beyond traditional roles and missions to employ military capabilities wherever relevant to HLS/D. DOD's participation in HLS is legitimized by many laws and regulations, including Presidential Decision Directives 39 (1995) and 62 (1996), which cover U.S. policy on Counter-terrorism and Protection Against Unconventional Threats to the Homeland. More recently, President Bush's Executive Order 13228, which established the Office of Homeland Security headed by Governor Ridge, contains impetus to provide DOD the resources to assist in homeland security. The primary mission of the U.S. military is first and foremost to fight and win the nation's wars. Service members are trained and ready to defend our nation from attack. U.S. military forces have worked and partnered effectively with U.S. civil authorities in a variety of crises, including natural disasters and public disorders. However, a principal concern deals with the apportionment of forces between the primary war fighting mission and the new, emergent homeland security challenge.

DOD's HLS/D objectives are to ensure the safety and security of U.S. territory, domestic population, and critical infrastructure against attacks emanating from outside the United States. Additionally, DOD must provide support to U.S. civil authorities for domestic emergencies, civil disturbances, and designated law enforcement efforts. To meet these objectives, the 2002 Unified Command Plan (UCP) will realign the U.S. military command structure to address 21st century threats by establishing a new geographic command (USNORTHCOM). The new combatant commander will be responsible for U.S. homeland defense, including land, aerospace, and sea defenses. NORTHCOM will be charged with security cooperation and contingency response with Canada and Mexico. The creation of NORTHCOM will provide for a more coordinated approach in

military support to civil authorities such as FEMA, the FBI, local and state governments in the event of natural disasters, chemical, biological, radiological, high-yield explosive (CBRNE) events, or civil disturbances. ix

DOD HLS/D PROPOSED CONOPS

In the absence of a U.S. national plan for HLS/D, it is not surprising that there is no cohesive DOD CONOPS for employment of military forces in HLS/D. However, from the literature it is possible to suggest what the DOD CONOPS might look like.

As with the broader objective of national security, it is important to remember that keeping the U.S. homeland secure cannot be accomplished solely by America's military. However, the national temptation is always great to look to DOD first instead of using a possibly more appropriate agency to perform certain missions in homeland security. That said, the proposed DOD CONOPS will describe the overall objectives, the missions assigned to the components of the force, and how the components should work together to accomplish the mission. To frame the issues associated with tying together disparate dangers and concerns, it is useful to employ a defense in depth approach that provides layers of protection, each maintained by appropriate agencies. This layered approach could facilitate the organization, resource allocation, and tasking required to secure the homeland.

The first and most important layer of defense will be **prevention**. Prevention involves shaping the security environment to avoid or obstruct threats to the United States. Prevention includes deterrence, counter-proliferation, and non-proliferation. An essential element in preventing an attack is accurate and timely intelligence, especially the ability to identify potential attackers. It is preferable to prevent the emergence of a threat or neutralize the threat as far as possible from our homeland.

The second layer, **defending**, consists of measures to detect and defuse attacks. This layer presents the greatest challenge and encompasses missions such as air, sea, and land interdiction, counter-terrorism, and missile defense. The defense layer is where we have spent much of our effort and resources to defend against attacks. The openness of U.S. borders and society permits multiple methods to attack our homeland. Even when we can erect an effective defense against one attack vector, there will still be other avenues for the adversary to pursue.

The third layer, **responding**, is the capability to handle the consequences of an attack.

Responding includes measures to save lives, limit the spread of attack effects, and provide emergency relief. The military will rely heavily upon the Reserve and National Guard elements that possess the experience and specialized capabilities.

DOD has many challenges ahead to ensure homeland security. DOD tasks include land, aerospace, and sea defenses. To ensure a desired end state is achieved, DOD must apply resources to missile defense, land defense, aerospace defense, information/computer operations, civil support, and maritime defense. Maritime defense will play a critical role in achieving our strategic objective of preventing, defending against, and responding to attacks on our homeland.

MARITIME HLS/D CURRENT STATUS

In the maritime realm of U.S. national security, the Navy historically has emphasized forward presence and first response to overseas crisis. The Coast Guard, with some exceptions, has concentrated its efforts in U.S. waters.

Since September 11, 2001, the Coast Guard dramatically shifted its mission activity to reflect its role as a leader in Maritime HLS. Coast Guard established near-shore and port domain awareness with cutters, aircraft, and small boats patrolling ports and coastlines. Coast Guard recalled selected reservists to support homeland security. Finally, Coast Guard issued an emergency temporary

regulation changing the advance notification requirement from 24 to 96 hours for ships entering U.S. ports. The increase in security posture is not sustainable, nor is it the most efficient and effective use of resources. Non-HLS/D missions are being curtailed because of lack of resources. The Coast Guard cannot accomplish the Maritime HLS/D mission alone and must have assistance.

Until such time as USNORTHCOM is established, Commander, U.S. Joint Forces command (CINCJFCOM), has responsibility for DOD in the maritime defense of the United States.

CINCJFCOM has been working closely with the Coast Guard to establish requirements for assistance in supporting maritime defense. In the months following 11 September, Coast Guard and Navy have been working together to sort out responsibilities. A number of "idea" papers have been published, and the Coast Guard Commandant published a maritime security CONOPS in December 2001. However, that CONOPS essentially addresses Coast Guard units and personnel. It does not "fill the shoes" of what is really required: a functional, multi-service maritime CONOPS.

A U.S. MARITIME HLS/D CONOPS

It seems clear that the Coast Guard is overwhelmed by post-911 requirements, that maritime HLS/D organizational precepts developed during the Cold War are no longer sufficient, and that the Navy and Coast Guard require a simple, effective, integrated CONOPS to accomplish maritime HLS/D. This section will suggest such a CONOPS with particular attention to the tasks that the Navy should perform. All CONOPS essential components addressed in the CONOPS FORMULATION section will not be addressed due to the constraints placed on the length of this paper; however, major components will be discussed.

To develop a useful Maritime CONOPS, we must first identify the operational objectives.

The operational objectives are to deter, protect, defend, and respond against terrorist threats and

attacks on U.S. territory, critical infrastructure, and the American people. These objectives are met by ensuring full security of our ports, waterways, coastal areas, and associated airspace.

From the maritime objectives flow the specified, implied, and essential tasks. Specified tasks are those from a higher commander detailing what he wants accomplished. Implied tasks are those additional major tasks necessary to accomplish the mission assigned. Essential tasks are those that must be executed to achieve the conditions that define success. Below are the specified, implied, and essential tasks required to attain the Maritime HLS/D objectives.

Specified Tasks

- Deter enemy threats against the homeland
- Defend against enemy attacks
- Military support to civil authorities such as FEMA, the FBI, local and state governments
- Security cooperation and contingency response with Canada and Mexico
- Operational Force Protection
- Synchronize intelligence information among federal, state, local, and partner country agencies.

Implied Tasks

- Deploy forces
- Law enforcement Operations
- Maritime Interception Operations
- Detect, locate, track threats
- Intelligence and information gathering

Essential Tasks

- Deter enemy threats against the homeland
- Defend against enemy attacks
- Military support to civil authorities such as FEMA, the FBI, local and state governments
- Security cooperation and contingency response with Canada and Mexico
- Command and control coordination.

The Coast Guard cannot accomplish all the above tasks due to resource limitations. The Navy is not able to participate in some tasks, such as law enforcement, because federal law prohibits direct military involvement in civilian law enforcement. However, the Navy can assist and provide resources to ensure mission success. The Navy provides a capability to prevent, defend, and respond to homeland attacks. As discussed in the DOD CONOPS section, HLS/D can be consolidated into a

defense in depth approach that provides layers of protection. The Navy could contribute significantly to tasks that must be executed to achieve conditions that define success (essential tasks). Thus, the U.S. HLS/D maritime CONOPS should comprise Prevention, Defense, and Response phases; the following sub-sections will explain how best the Navy may perform the relevant maritime tasks in each phase. Essential tasks must be executed successfully during the three phases of HLS/D:

Prevention Phase: Deter Threat

A vital element in preventing an attack is accurate and timely intelligence. It is preferable to prevent or interrupt an attack far from the U.S. homeland. Forward presence and power projection missions will continue to bolster deterrence; however, successful Navy execution of the following tasks would assist in early detection and deterrence of threats to our homeland.

Deter Enemy Threats against the Homeland

Forward presence, control of sea lines of communications, and direct action limit an adversary's ability to maneuver, translate his plans to action, and control his force. Normal U.S. fleet activities of tracking, identifying, and interdicting shipping effectively push U.S. borders further out, providing intelligence and law enforcement organizations time to analyze threats, provide warning, and take preemptive action. Our biggest challenges in this area are identifying/tracking vessels transiting to/from our ports, and integrating with Coast Guard efforts.

Information is key. Our national ability to detect potential threats in our maritime domain could be significantly improved with Navy resources. Improved situational awareness will increase the ability to acquire, track, and identify vessels and aircraft entering America's maritime domain. Coast Guard and Navy must combine resources to create a culture of intelligence sharing, and establish standard operating procedures to exchange information. Exploiting this capability ensures intelligence gained by Maritime Patrol and other tactical aircraft, surface ships, and submarines is

fused with information received by the Coast Guard, other government agencies, civil authorities, and friendly countries.

Today, we have information available on vessels bound for the United States from the other side of the earth. The difficulty is in tracking and identifying the vessels after they depart a foreign port. Unfortunately, there is no effective method for maintaining an accurate daily track of their voyages. Two solutions to assist in solving this problem are possible. First, all military ships, maritime patrol aircraft, and U.S. flagged vessels should better employ the Maritime Reporting System. It provides a standardized method for contact reports, status reports, summaries, and message planning within a maritime operational environment. Maritime Force Locator (LOCATOR) is a formatted message most commonly used by intelligence personnel at sea. The LOCATOR message, formally called MAREP, is generated by maritime forces to report surface, subsurface, air, or special interest units operating in a maritime environment. The Maritime Reporting System is governed by the Navy publication, NWP 10-1-12 (Revision C). A master database with contacts of interest should be updated and maintained. Maritime Intercept Operations in U.S. FIFTH Fleet currently use a similar method. We should adopt analogous procedures to use while underway, whether in the Arabian Gulf or local training areas. This would assist in tracking high interest vessels from port of origin to U.S. arrival.

Second, we should require commercial shipping that enters the U.S. territorial waters to have a vessel transponder similar to that of commercial aircraft. This would provide the ability to track a vessel before its arrival in U.S. waterways and ports. The vessels should be placed in a "hold" pattern until approval to enter port is granted. All cargo onboard the arriving vessel should be seized if a ship enters our territorial waters without permission. Navy surface ships would be the primary method to monitor ships in a "hold" pattern. The monitoring operation is analogous to operations conducted against United Nations sanctions violators in the Arabian Gulf. This option may be

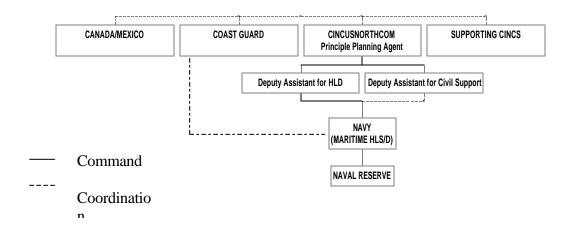
difficult to get approved by our Congressional leaders; however, extraordinary HLS/D must be explored.

Defending: Defend against Enemy Threats

Command and Control Coordination

The Maritime HLS/D CONOPS must first address the command and control arrangement required to complete the essential tasks. Command and control is the foundation upon which the planning and execution of joint, combined, and naval operations are built—from peacetime forward presence, to operations other than war, to crisis response, or to our current war on terrorism. Establishing a simplified command and control arrangement provides the best opportunity for success. The recommended command and control (C2) arrangement for Maritime HLS/D is contained in Figure 1.

Figure 1: Maritime HLS/D Proposed C2 Arrangement



A key element for success in HLS/D will be effective Command and Control with all partners. Coast Guard must develop fast secure communications to operational level ashore and

tactical level afloat. Navy ships have moved forward with IT-21, and installations are completed on most ships. Coast Guard must install IT-21 systems on USCG cutters. Upgrading communications capabilities today would not be a large undertaking, but will increase C4ISR capabilities. The benefits of real-time data streams and a common maritime operational picture would contribute to the commander's situational awareness. More importantly, the upgrade would expand surveillance/detection areas, and improve detection and identification of inbound targets of interest. *Maritime Interception Operations*

Maritime Interception Operations (MIO) comprise an area in which the Navy trains, operates, and has achieved proficiency. Navy ships have gained much expertise from conducting MIO in the Arabian Gulf and Red Sea. The tightening of U.S. air and land borders makes seaborne incursions a more appealing terrorist option. U.S. Navy ships work daily in local operating areas. The Navy should use this opportunity to augment the Coast Guard in patrolling the outer reaches of the nation's Exclusive Economic Zone and conducting MIO if a contact of interest is detected or reported. Providing MIO support to the Coast Guard will expand U.S. maritime surveillance coverage, give Coast Guard more assistance, and provide U.S. warships with valuable MIO experience. Further, time allocated in the inter-deployment cycle to MIO training could be better spent if ships demonstrate MIO proficiency. All ships would be eligible to conduct MIO duties. Training, doctrine, legal, and interoperability issues must be synchronized.

Most Effective Employment of Limited Resources

Effective Navy operations in the Defense Phase, particularly in coastal MIO and C2, will be difficult unless Navy employs an operational methodology that dedicates capabilities to these tasks. There are various options for such a methodology as follow.

The Navy needs a cadre of ships whose mission is to support maritime homeland defense. I propose establishing two squadrons of Naval Reserve Oliver Hazard Perry frigates (FFG) as the specialist in maritime homeland defense, and coordinating maritime issues with the Coast Guard and other federal agencies. Eight Naval Reserve FFGs with their embarked helicopters could provide a considerable deterrence, extend maritime surveillance, and perform gate-keeping duties at entries to our major seaports. This would require the FFGs be divided between the east and west coasts. There are some obvious advantages to this proposal. The ships are not tied to a Battle Group deployment cycle; this makes them available to perform gate-keeping duties. The ships provide a continuous presence in our coastal waterways that would allow the Coast Guard to focus its efforts elsewhere in the maritime domain. Navy Reserve FFG active crew complement is thirty percent less than its non-Reserve FFG counterparts. The FFGs provide a quick response military presence by providing immediate air assets; fast and secure communications; extended surveillance with organic search radars; a floating command and control center; a low risk asset to CBRNE attacks; and an available asset to conduct MIO on contacts of interest. The Navy could designate a Reserve flag officer, experienced in interagency operations and HLS/D issues, as the squadron commander. Many such specialists reside in the Naval Reserve. This plan would entail organizational and training changes for the Naval Reserve. The plan is feasible and would allow the Coast Guard to free scarce assets to conduct other missions.

A second option would assign Baseline I <u>Ticonderoga</u> Class Cruisers (CG 47-51) to dedicated homeland defense patrols. Recommend two cruisers be assigned to the east coast, two assigned to the west coast, and one assigned to the Gulf coast. Because the five cruisers are not aligned with any battle group, the assignment should cause little disruption. The current mission of these ships includes counter-drug operations in the Caribbean. Frigates and destroyers can also conduct such operations and could be assigned to fill the gaps left by redirecting the cruisers to

homeland defense missions. Dedicating the cruisers to homeland defense provides a highly capable platform that extends the air and surface battle space. The cruiser has a capability that could enhance NORAD's early warning system. The Aegis SPY-I radar ability provides an incremental increase to air/surface surveillance, and provides a platform with advanced C2 capabilities. Finally, in the event of an attack on U.S. homeland, the cruiser could provide an immediate floating command and control platform that would be less susceptible to the effects of CBRNE attacks. This option should be explored to enhance the security of our homeland.

Response Phase: Support Civil Authorities

The Navy has limited experience dealing with Military Support to Civil Authorities such as Crisis Management and Consequence Management. Navy Regional Authorities and Naval Reserve Emergency Liaison Officers are our greatest assets to deal with this new concern. Navy assets, by virtue of their mobility and dispersal throughout the country (including Reserve units in 50 states), will often be in a position to assist civil authorities. The Naval Reserve has specialists trained in a wide variety of casualty related fields. Hospital ships *Mercy* and *Comfort* are in reduced operating status; however, they can be fully operational on five days notice.

The Navy should investigate the option of designating a large deck amphibious ship or aircraft carrier on each coast as the HLS/D quick response platform for response to a terror attack. The ships could be assigned on a rotational basis during the inter-deployment cycle. To ensure standardization between east and west coast quick response assets, the ships would be required to demonstrate proficiency during the training cycle as floating command and control platforms. The concept is similar to that used by USS Kitty Hawk when she served in 2001-2002 as a dedicated platform for Special Operations Forces (SOF). The advantages include: excellent command and control facilities; highly mobile; low risk for attack by terrorist forces; limited susceptibility to chemical, biological, or radiological attack; and ability to carry large forces that could provide a

rapid supplement for limited local resources. FEMA, FBI, other federal organizations, and local agencies could use these quick response floating platforms to stage supplies. This option would be a low cost force multiplier in response to a terrorist attack. Training requirements to meet the objectives must be formulated, but this option is clearly feasible.

CONCLUSION

The events of September 11, 2001, significantly changed the nation's homeland security posture. Terrorism is a clear and present danger to the United States. The resources and methods available to U.S. border control agencies appear to be no match for the myriad threats from external locations. The Coast Guard is the Lead Federal Agent for HLS. The Navy's role in Maritime HLS/D is to support the Coast Guard. The Coast Guard does not have the resources available to combat this problem alone. The Navy provides capability to perform the specified, implied, and essential tasks required to meet Maritime HLS/D objectives. The Navy could contribute significantly to tasks that must be executed to achieve conditions that define success (essential tasks).

Maritime essential tasks include: deterring enemy threats against the homeland; defending against enemy attacks; supporting civil authorities; security cooperation and contingency response with Canada and Mexico; and command and control coordination. The Coast Guard cannot accomplish all such tasks due to resource limitations. The Navy can contribute significantly to prevent, defend, and respond to attacks on our homeland.

Since September 11, 2001, the Navy has been ready to assist the Coast Guard. It is now time to come together to control our maritime domain and ensure our homeland is protected.

NOTES

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¹ F. Saunders, "Talking Points on Unified Command Plan" (Washington, DC: OASD Public Affairs, April 2002), 1-5.

² Navy Department, <u>Naval Operational Planning</u>, NWP 5-01 (Rev. A), (Norfolk, VA: May 1998), A-46.

³ Joint Chiefs of Staff, <u>Department of Defense Dictionary of Military and Associated Terms</u>, Joint Pub 1-02 (Washington, DC:12 April 2001), 92

⁴ Naval Operational Planning, NWP 5-01 (Rev. A), A-47.

⁵ Greg Seigle, "Daily Briefing." <u>Homeland Security Office to Unveil National Strategy in June</u>. 11 April 2002. http://www.govexec.com/dailyfed/0402/041102gsn1.htm [14 April 2002]

⁶ President of the United States, Executive Order, "<u>Establishing the Office of Homeland Security and the Homeland Security Council</u>, 08 October 2001, 13228.http://www.whitehouse.gov/homeland/01.html [02 April 2002]

⁷ Ibid.

⁸ F. Saunders.

⁹ Ibid.

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